

**PLAINTIFF'S RESPONSES TO DEFENDANTS' STATEMENT OF UNDISPUTED FACTS**

1. Undisputed
2. Undisputed
3. Undisputed
4. Undisputed
5. Undisputed
6. Undisputed
7. Undisputed
8. Undisputed
9. Undisputed
10. Undisputed
11. Undisputed
12. Disputed. I was not combative. See Plaintiff Declaration.
13. Undisputed
14. Undisputed
15. Undisputed
16. Undisputed
17. Undisputed
18. Undisputed

**RECEIVED**

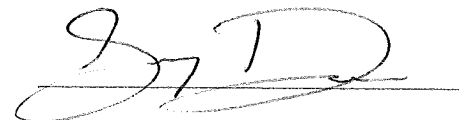
MAR 23 2020

U.S. DISTRICT COURT  
MIDDLE DISTRICT OF TN.

19. Disputed. Bowers purpose was never to take over the transportation. He immediately approached and rammed head in wall out of pod door. Injuries were shown in pictures. See pictures. See Plaintiff Declaration.
20. Disputed. Trafton aided in transporting me and was one of the officers involved when I was taken to a secluded area. See Plaintiff Declaration.
21. Disputed. I did not struggle against my restraints. I was compliant. See Plaintiff Declaration.
22. Disputed. I did not pull away. I was complaint. See Plaintiff Declaration.
23. Disputed. I did not kick anyone. I was compliant. See Plaintiff Declaration.
24. Disputed. I was compliant and did not pose an immediate threat to myself nor any officers present.
25. Disputed. I was not resisting.
26. Disputed. Ward absolutely used more force than necessary because I was compliant the entire time.
27. Disputed. Bowers absolutely used more force than necessary because I was compliant the entire time. See Plaintiff Declaration.
28. Disputed. The officers intentionally took them to room to beat me. See Plaintiff Declaration.
29. Disputed. I was not struggling. See Plaintiff Declaration.
30. Disputed. I did not pull away. See Plaintiff Declaration.
31. Disputed. I did not kick anyone. See Plaintiff Declaration.

32. Disputed. I was compliant and did not pose an immediate threat to myself nor any officers present. See Plaintiff Declaration.
33. Disputed. I was never told to get on the ground. They beat me to the ground. See Plaintiff Declaration.
34. Disputed. Ward absolutely used more force than necessary because I was compliant the entire time. See Plaintiff Declaration.
35. Disputed. Bowers absolutely used more force than necessary because I was compliant the entire time. See Plaintiff Declaration.
36. Disputed. I was compliant the entire time once out of my cell. See Plaintiff Declaration.
37. Undisputed
38. Undisputed
39. Undisputed
40. Undisputed
41. Disputed. SCCF does not follow the policy. They actually hinder the policy. See Plaintiff Declaration.
42. Disputed. I can not speak to what is given to every inmate. See Plaintiff Declaration.
43. Undisputed
44. Disputed. I can speak to the exact requirements without documentation from policies from 2016. See Plaintiff Declaration.
45. Undisputed
46. Disputed. SCCF hinders the process of appropriately filing grievances. See Plaintiff Declaration.

47. Undisputed
48. Disputed. This cannot be true because Pevahouse's declaration did not mention all of my grievances filed. See Plaintiff Declaration. See Pevahouse declaration.
49. Disputed. I filed several grievances and received no responses or excuses like my handwriting was illegible. Therefore, TOMIS cannot possibly conclude I did not file appropriate grievances. In the alternative, if it's based on SCCF officials inputting the information in TOMIS system, it's quite possible that the system states that in an attempt to cover up the actions of the officers. See Plaintiff Declaration.
50. Disputed. I have filed multiple grievances against Bowers and Trafton. Therefore, TOMIS cannot possibly conclude I did not file grievances after October 2, 2016. In the alternative, if it's based on SCCF officials inputting the information in TOMIS system, it's quite possible that the system states that in an attempt to cover up the actions of the officers. See Plaintiff Declaration.
51. Disputed. CoreCivic did not properly train their employees. See Plaintiff Declaration.
52. Lack of knowledge
53. Lack of knowledge
54. Lack of knowledge
55. Lack of knowledge

A handwritten signature in black ink, appearing to read 'Gregory Douglas', with a horizontal line drawn underneath the signature.

Gregory Douglas

DATE:

3-13-20